

FILED

September 23, 2020

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

BY: **WG**

DEPUTY

SA:20-CR-434-FB

UNITED STATES OF AMERICA,

Plaintiff,

v.

**MARIA ISABEL ALANIS (1) and
CRISTIAN HIDALGO (2),**

Defendants.

INDICTMENT

CRIMINAL NO:

**COUNT I: 21 U.S.C. §846, 841(a)(1),
841(b)(1)(A) – Conspiracy to Possess with
Intent to Distribute Methamphetamine**

**COUNT II: 21 U.S.C. §846, 841(a)(1),
841(b)(1)(A) – Conspiracy to Possess with
Intent to Distribute Heroin**

**COUNT III: 21 U.S.C. §841(a)(1),
841(b)(1)(A) – Possession with Intent to
Distribute More Than 500 Grams of
Methamphetamine**

**COUNT IV: 21 U.S.C. §841(a)(1),
841(b)(1)(A) – Possession with Intent to
Distribute More Than 1 Kilogram of
Heroin**

**COUNT V: 21 U.S.C. §841(a)(1),
841(b)(1)(B) – Possession with Intent to
Distribute More Than 50 Grams of
Methamphetamine**

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(A)]

That from on or about August 2020, the precise date unknown, to on or about September 5, 2020, in the Western District of Texas, Defendants

**MARIA ISABEL ALANIS (1) and
CRISTIAN HIDALGO (2),**

and others, did knowingly and intentionally combine, conspire, confederate and agree to distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing a

detectable amount of methamphetamine, a Schedule II controlled substance, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

COUNT TWO

[21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(A)]

That from on or about August 2020, the precise date unknown, to on or about September 5, 2020, in the Western District of Texas, Defendants

**MARIA ISABEL ALANIS (1) and
CRISTIAN HIDALGO (2),**

and others, did knowingly and intentionally combine, conspire, confederate and agree to distribute and possess with intent to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

COUNT THREE

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)]

That on or about September 5, 2020, in the Western District of Texas, Defendant

MARIA ISABEL ALANIS (1)

did knowingly, intentionally and unlawfully possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT FOUR

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)]

That on or about September 5, 2020, in the Western District of Texas, Defendant

MARIA ISABEL ALANIS (1)

did knowingly, intentionally and unlawfully possess with intent to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT FIVE

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)]

That on or about September 5, 2020, in the Western District of Texas, Defendant

CRISTIAN HIDALGO (2)

did knowingly, intentionally and unlawfully possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

UNITED STATES OF AMERICA'S NOTICE OF DEMAND FOR FORFEITURE

[See FED. R. CRIM. P. 32.2]

I.

Drug Violations and Forfeiture Statutes

**[Title 21 U.S.C. §§ 841(a)(1), (b)(1)(A), & (b)(1)(B) and 846
subject to forfeiture pursuant Title 21 U.S.C. §§ 853(a)(1) & (2)]**

As a result of the foregoing criminal violations set forth in Counts One to Five, the United States gives notice to the Defendant of its intent to seek the forfeiture of property, including any items listed below, upon conviction and as a part of sentence pursuant to FED. R. CRIM. P. 32.2 and Title 21 U.S.C. §§ 853(a)(1) & (2), which state:

Title 21 U.S.C. § 853. Criminal Forfeitures

(a) Property subject to criminal forfeiture

Any person convicted of a violation of this subchapter or subchapter II punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law—

- (1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;
- (2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

This Notice of Demand for Forfeiture includes but is not limited to the following:

- **\$12,529.00, More or Less, in United States Currency.**

A TRUE BILL.



FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY:



FOR ERIC YUEN
Assistant United States Attorney